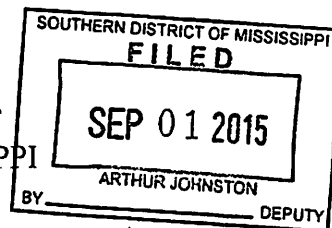


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

JEFFREY C. RANDALL

CRIMINAL NO.: *3:15-cr-00075-DPJ-LRA*

18 U.S.C. § 371
26 U.S.C. § 7206(1)

The Grand Jury charges:

At all relevant times,

1. Defendant **JEFFREY C. RANDALL** ("RANDALL") was the President and sole shareholder of the Gulf States Royalty, Ltd. corporation ("Gulf States").

COUNT 1

2. From on or about September 15, 2009, the exact date being unknown to the Grand Jury, and continuing thereafter until on or about December 31, 2011, in Hinds County in the Northern Division of the Southern District of Mississippi, the defendant, **JEFFREY C. RANDALL**, did unlawfully, voluntarily, intentionally, and knowingly conspire, combine, confederate, and agree together and with each other and with other individuals both known and unknown to the grand jury, to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful Government functions of the Internal Revenue Service of the Treasury Department in the ascertainment, computation, assessment, and collection of the revenue: to wit, income taxes.

3. The manner and means by which the conspiracy was sought to be accomplished included, among others, the following:

4. Defendant **RANDALL** contacted an unindicted co-conspirator, who had prepared defendant **RANDALL**'s personal income tax returns since approximately 2006, regarding the

filing of Gulf States' 2008 corporate income tax returns. The unindicted co-conspirator prepared the corporate tax return, including gross receipts of \$3,757,280, and informed defendant **RANDALL** of Gulf States' tax liability.

5. Defendant **RANDALL** was unwilling to pay the tax due on Gulf States' income for 2008, and instructed the unindicted co-conspirator to create false deductions. On or about September 15, 2009, and after including the false deductions in the approximate amount of \$2,400,000.00 and receiving defendant **RANDALL**'s approval, the unindicted co-conspirator filed the false 2008 tax return for Gulf States.

6. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the following overt acts were committed in the Southern District of Mississippi, and elsewhere:

A. On or about September 15, 2009, **RANDALL** went to an unindicted co-conspirator to have Gulf States' 2008 corporate tax return, Form 1120, prepared. **RANDALL** provided the unindicted co-conspirator with Gulf States' corporate bank account information.

B. After preparing Gulf State's 2008 Form 1120, the unindicted co-conspirator contacted defendant **RANDALL** and informed him of Gulf States' tax liability.

C. Defendant **RANDALL** told the unindicted co-conspirator that the tax liability was more than he was willing to pay. Defendant **RANDALL** instructed the unindicted co-conspirator to change the Form 1120 to include false and fraudulent deductions to lower Gulf States' tax liability.

D. The unindicted co-conspirator changed the Form 1120 and included over approximately \$2,400,000.00 in false deductions and adjustments.

E. Defendant **RANDALL** instructed the unindicted co-conspirator to file the tax return.

F. On September 15, 2009, an unindicted co-conspirator filed Gulf States' corporate tax return, Form 1120, with the false deductions and adjustments.

All in violation of Sections 371 and 2, Title 18, United States Code.

COUNT 2

7. On or about September 15, 2009, in Hinds County in the Northern Division of the Southern District of Mississippi, the defendant, **JEFFREY C. RANDALL**, a resident of Ridgeland, Mississippi, who was the President of Gulf States Royalty, Ltd., a corporation, aided and abetted by others known and unknown by the grand jury, did willfully make and subscribe a U.S. Corporation Income Tax Return, Form 1120, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That U.S. Corporation Income Tax Return, Form 1120, which was prepared and signed in the Southern District of Mississippi and was filed with the Internal Revenue Service, stated that it was reported that the taxable income of the corporation for the calendar year was the sum of approximately \$338,972.00 and that the total tax due and owing thereon was the sum of approximately \$115,250.00, whereas, as he then and there knew the taxable income of Gulf States Royalty, Ltd. for calendar year 2008 was the sum of approximately \$2,762,608.00, upon which taxable income that was due and owing to the United States of America was a total tax of approximately \$939,286.72.

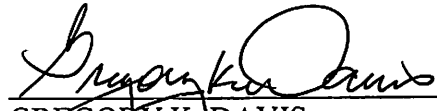
In violation of Section 7206(1), Title 26, United States Code, and Section 2, Title 18, United States Code.

COUNT 3

8. That on or about September 15, 2010, in Hinds County in the Northern Division of the Southern District of Mississippi, the defendant, **JEFFREY C. RANDALL**, a resident of

Ridgeland, Mississippi, aided and abetted by others known and unknown to the grand jury, did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, for the calendar year 2009, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported that his taxable income for the calendar year was the sum of approximately \$94,930.00, whereas, as he then and there knew he received taxable income of approximately \$668,021.00 in addition to the amount stated in the return.

In violation of Section 7206(1), Title 26, United States Code, and Section 2, Title 18, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 1st day of September, 2015.


UNITED STATES MAGISTRATE JUDGE